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Black Hills Forest Resource Association

2218 Jackson Boulevard, Suite 10, Rapid City, South Dakota 57702-3452, (605) 341-0875

Secretary of Agriculture Mike Johanns 2007 Farm Bill Comments 1400 Independence Avenue, SW. Washington, DC 20250-3355

December 30, 2005

Dear Secretary Johanns:

The Black Hills Forest Resource Association is a regional trade organization of forest products manufacturers, timber harvesting contractors, and other businesses and interests in the forest industry of western South Dakota and northeast Wyoming. Our membership procures its supply of raw material from a combination of state, federal, and private lands. Our principal interest in the 2007 Farm Bill pertains to programs designed to support the management and improvement of native forestland.

Regrettably, the success of such programs in meeting the needs of forest landowners in the Black Hills region has been mottled since the inception of the EQUIP program in place of the former SIP, FIP, and FLEP programs. The primary source of technical expertise and cost-share assistance to forestland owners in the Black Hills is through the State of South Dakota Department of Agriculture, Division of Resource Conservation and Forestry. However, due to funding allocation formulas and changes to project categories, the distribution of funding under EQUIP has been weighted heavily toward urban forestry programs and urban areas in general. Private forestland management under USDA assistance in South Dakota has therefore suffered considerably, as a majority of the state is of rural character.

The disparity in the effectiveness of the EQUIP program is directly applicable to Question 4 from the listening sessions, regarding 'the achievement of environmental and conservation goals.' The production of cleaner air and cleaner water through Farm Bill programs is ill served by allocating resources toward urban areas at the expense of private forestlands. Providing forestland owners with a meaningful amount of incentives and cost-share programs to ensure their continued productivity would ensure the achievement of conservation goals two-fold; firstly, through direct enhancements to forestland, and secondly, by discouraging development and subdivision of forests into smaller tracts.

Therefore, we urge you to consider reinstating and fully funding the former FIP. SIP, and FLEP programs in the 2007 Farm Bill, or undertaking a significant overhaul of EQUIP in uch a way that better serves the needs of rural forestland owners.

Sincerely.

Forest Programs Manager

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